IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

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)	Case No: 1:10-CV-4257
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)	Hon. Robert M. Dow, Jr.
)	U.S. District Court Judge
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)	Hon. Sheila M. Finnegan
)	U.S. Magistrate Judge
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UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO MOTION TO DISMISS

NOW COME the Plaintiffs, Second Amendment Arms (a d/b/a of R. Joseph Franzese), R. Joseph Franzese, individually and d/b/a Second Amendment Arms, Robert M. Zieman, Sr., and Tony Kole, by and through undersigned counsel, and move this Honorable Court to grant Plaintiffs an extension of time to file their Response to Defendants' Motion to Dismiss their Fourth Amended Complaint. In support thereof, Plaintiffs state as follows:

- 1. This action alleges violations of the Plaintiffs' constitutional rights owing to certain of Defendants' past and present regulations regarding the sale of firearms in Chicago.
- 2. Plaintiffs filed a pending Fourth Amended Complaint, to which Defendants filed a Motion to Dismiss. Plaintiffs' Response is due March 5, 2015.

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3. Due to Plaintiffs' counsel's caseload, Plaintiffs are unable to complete the

Response by the due date, despite efforts to do so.

4. Therefore, Plaintiffs are requesting an additional 14 days, or by February 19,

2015, to file the Response to the pending Motion to Dismiss.

5. Defendants' counsel is not opposed to the granting of this Motion, following e-

mails between counsel. Defendant's counsel requests until March 12, 2015 to file a Reply brief,

to which Plaintiffs are not opposed.

6. This Motion is not filed for dilatory purposes or for delay, but only so that

Plaintiffs may fully present their arguments before the Court.

WHEREFORE, the Plaintiffs, Second Amendment Arms (a d/b/a of R. Joseph Franzese),

R. Joseph Franzese, individually and d/b/a Second Amendment Arms, Robert M. Zieman, Sr.,

and Tony Kole, by and through undersigned counsel, request this Honorable Court grant them an

extension of time until February 19, 2015 to file a Response to the Motion to Dismiss, as well as

any and all further relief as this Court deems appropriate, including granting Defendants until

March 12, 2015 for a Reply brief..

Respectfully submitted,

/s/ David G. Sigale

Attorney for Plaintiffs

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CERTIFICATE OF ATTORNEY AND NOTICE OF ELECTRONIC FILING

The undersigned certifies that:

- 1. On February 5, 2015, the foregoing document was electronically filed with the District Court Clerk *via* CM/ECF filing system;
- 2. Pursuant to F.R.Civ.P. 5, the undersigned certifies that, to his best information and belief, there are no non-CM/ECF participants in this matter.

/s/ David G. Sigale
Attorney for Plaintiffs

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